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14 David Joseph Robinson

15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 FABIAN JESUS BROOKS ARIAS, ) Case No. 2:21-cv-00644-GMN-DJA  
18 Plaintiff, )  
19 vs. )  
20 DAVID JOSEPH ROBINSON, an )  
21 individual; DOES I through XV, and ROE )  
22 Corporations I through X, inclusive., )  
23 Defendant. )  
24 \_\_\_\_\_

25 **STIPULATION AND ORDER  
26 REGARDING THE DEPOSITION  
27 OF DR. DEXTER**

28 Plaintiff, FABIAN JESUS BROOKS ARIAS, and Defendant, DAVID JOSEPH  
1 ROBINSON (collectively, the “Parties”) by and through their respective counsel,  
2 hereby submit this Stipulation and Order Regarding the Deposition of Dr. Dexter  
3 (hereinafter, “Stipulation and Order”), pursuant to LR 26-6 and LR IA 1-3(f).

4 This Stipulation and Order shall not affect the Dispositive Motion Deadline  
5 presently set for April 8, 2022. (See, Joint Discovery Plan and Proposed Scheduling  
6 Order, ECF 14), on file and referenced herein). Further, this Stipulation and Order  
7 shall not affect the Pretrial Order deadline of May 8, 2022. (See *Id.*).

8 The Parties met and conferred in good faith pursuant to LR IA 1-3(f) and agreed  
9 to the following Stipulation and Order with respect to the deposition of Dr. Dexter

1 which will exceed the ten (10) depositions provided for by FRCP (a)(2)(A)(i). As  
2 previously stipulated, due to scheduling conflicts, the unavailability of treating  
3 physician/expert witnesses, and the depositions of out-of-state witnesses, this  
4 Stipulation and Order is necessary to allow for Dr. Dexter's testimony outside the close  
5 of discovery.

6 Furthermore, Plaintiff originally disclosed Dr. Roger Moore as the treating  
7 provider from Spinal Rehabilitation Center, but Dr. Moore is no longer a clinician at  
8 that provider. Accordingly, Dr. Dexter was another treating chiropractor and was  
9 substituted as a witness in his place on behalf of that provider. As such, the Parties  
10 have agreed to allow the following eleventh (11<sup>th</sup>) deposition of Dr. Dexter to proceed  
11 outside the close of discovery and prior to the Dispositive Motion Deadline of April 8,  
12 2022. **There are no further anticipated stipulations related to depositions in this**  
13 **matter.**

14 The stipulated deposition is scheduled to proceed as follows:

15 1. Dr. Roger Dexter, D.C., on March 29, 2022 at 1:30 p.m.

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1           **IT IS SO STIPULATED.**

2           DATED 3<sup>rd</sup> day of March 2022.

2           DATED 3<sup>rd</sup> day of March 2022.

3           **GINA CORENA & ASSOCIATES**

3           **BREMER WHYTE BROWN &**  
4           **O'MEARA LLP**

5           /s/, Betsy Jefferis, Esq.

5           /s/ Ty M. Maynarich, Esq.

6           GINA M. CORENA, ESQ.

6           PETER C. BROWN, ESQ.

7           Nevada Bar No. 10330

7           Nevada Bar No. 5887

8           BETSY C. JEFFERIS, ESQ.

8           TY M. MAYNARICH, ESQ.

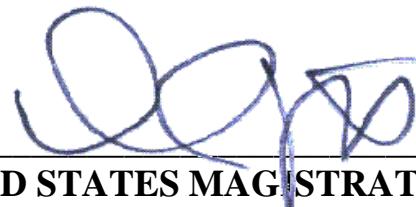
9           Nevada Bar No. 12980

9           Nevada Bar No. 14584

9           Attorneys for Plaintiff

9           Attorneys for Defendant

10           **IT IS SO ORDERED.**



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**UNITED STATES MAGISTRATE JUDGE**

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**DATED:** March 4, 2022

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**From:** [Betsy Jefferis](#)  
**To:** [Ty M. Maynarich](#); [Real Jumao-as](#)  
**Cc:** [Michelle Dowling](#); [Bradley Williams](#); [Peter Brown](#)  
**Subject:** RE: 2:21-cv-00644-GMN-DJA - Arias v. Robinson - DOI 10/17/2019 - BWBO 1220.363 - SAO Dexter  
**Date:** Thursday, March 03, 2022 10:47:17 AM

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Approved. Thanks,



**BETSY C. JEFFERIS, ESQ.**

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*Gina Corena & Associates*  
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**From:** Ty M. Maynarich <[tmaynarich@bremerwhyte.com](mailto:tmaynarich@bremerwhyte.com)>  
**Sent:** Thursday, March 3, 2022 10:43 AM  
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**Subject:** FW: 2:21-cv-00644-GMN-DJA - Arias v. Robinson - DOI 10/17/2019 - BWBO 1220.363 - SAO Dexter

Betsy,

Please find enclosed our SAO regarding Dr. Dexter's deposition which will be the 11<sup>th</sup> on behalf of Defendant in this matter. Let me know if you would like any further changes and please provide your authorization to affix your electronic signature.

Thank you,  
Ty Maynarich

**Ty M. Maynarich**  
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